Natalie L. Arbaugh State Bar No. 24033378 WINSTON & STRAWN LLP

2121 N. Pearl Street, Suite 900

Dallas, TX 75201 T: (214) 453-6500 F: (214) 453-6400 narbaugh@winston.com

Attorneys for Christopher Cox

David Neier (admitted pro hac vice)

WINSTON & STRAWN LLP

200 Park Avenue New York, NY 10166-4193 T: (212) 294-6700 F: (212) 294-4700

dneier@winston.com

Thomas M. Buchanan (admitted *pro hac vice*) WINSTON & STRAWN LLP

1901 L St., N.W. Washington, DC 20036 Tel.: (202) 282-5000 Fax: (202) 282-5100 tbuchana@winston.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re: : Chapter 11

The National Rifle Association of America, *el al.* ¹:

: (Jointly Administered)

Debtors.

Case No. 21-30085-hdh11

CHRISTOPHER W. COX'S JOINDER TO (I) THE MOTIONS TO DISMISS OR, IN THE ALTERNATIVE, TO APPOINT A CHAPTER 11 TRUSTEE FILED BY ACKERMAN MCQUEEN, INC. AND THE STATE OF NEW YORK, OR (II) THE MOTION OF PHILLIP JOURNEY FOR APPOINTMENT OF AN EXAMINER

Christopher W. Cox ("Cox"), by and through his undersigned counsel, hereby files this joinder to Ackerman McQueen, Inc. 's Motion to Dismiss the Chapter 11 Bankruptcy Petition, or, in the Alternative, Motion for the Appointment of a Chapter 11 Trustee, and Brief in Support (Dkt. 131) ("Ackerman's Motion to Dismiss"); The State of New York's Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee (Dkt. 155) (together with Ackerman's Motion to Dismiss, the "Motions to Dismiss"); and The Honorable Phillip Journey's Motion for

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

Appointment of Examiner (Dkt. 114) (the "Examiner Motion"). Cox hereby joins in the relief sought in the Motions to Dismiss² and the Examiner Motion.

WHEREFORE, for the reasons set forth in the Motions to Dismiss and the Examiner Motion, Cox respectfully requests that this Court enter an order (i) dismissing the Bankruptcy Case, or, in the alternative, authorizing the appointment of a chapter 11 trustee, or (ii) appointing an examiner; and (iii) granting such other and further relief as the Court deems appropriate and just.

Dated: February 17, 2021 Respectfully submitted,

WINSTON & STRAWN LLP

/s/ Natalie L. Arbaugh

Natalie L. Arbaugh State Bar No. 24033378

2121 N. Pearl Street, Suite 900

Dallas, TX 75201

T: (214) 453-6500

F: (214) 453-6400

narbaugh@winston.com

David Neier

(admitted pro hac vice)

200 Park Avenue

New York, NY 10166-4193

T: (212) 294-6700

F: (212) 294-4700

dneier@winston.com

Thomas M. Buchanan

(admitted *pro hac vice*) 1901 L St., N.W.

Washington, DC 20036

Tel.: (202) 282-5000

Fax: (202) 282-5100

tbuchana@winston.com

Attorneys for Christopher Cox

² While Cox agrees with the Arguments in the Motions to Dismiss, he does not join in all of the factual allegations therein.

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2021, I caused a true and correct copy of the foregoing document to be served upon all parties listed in the attached Master Service List via the Court's CM/ECF system, U.S. mail, and/ or email where listed.

/s/ David Neier

In re: Sea Girt LLC - Case No. 21-30080 In re: National Rifle Association of America - Case No. 21-30085

MASTER SERVICE LIST

Debtor/Debtor's Counsel

National Rifle Association of America 11250 Waples Mill Road Fairfax, VA 22030 Neligan LLP
Attn: Patrick J. Neligan
Douglas J. Buncher
John D. Gaither
325 N. St. Paul, Suite 3600

Dallas, TX 75201

Email: pneligan@neliganlaw.com
dbuncher@neliganlaw.com
jgaither@neliganlaw.com

Sea Girt LLC 11250 Waples Mall Road Fairfax, VA 22030

U.S. Trustee

Office of the United States Trustee Attn: Lisa Young Earle Cabell Federal Building 1100 Commerce Street, Room 976 Dallas, TX 75242

Secured Creditors

Atlantic Union Bank Attn: Andrew Kalin 1800 Robert Fulton Drive, Suite 100

Reston, VA 20191

Email: andrew.kalin@atlanticunionbank.com

20 Largest Unsecured Creditors

Ackerman McQueen, Inc. 1601 Northwest Expressway Oklahoma City, OK 73118-1438 Membership Marketing Partners LLC 11250 Waples Mill Road, Suite 310 Fairfax, VA 22030 Gould Paper Corporation Attn: Warren Connor 99 Park Avenue, 10th Floor New York, NY 10016

Under Wild Skies 201 N. Union Street, Suite 510 Alexandria, VA 22314

Quadgraphics N63W23075 Hwy. 74 Sussex, WI 53089

Membership Advisors Public REL 11250 Waples Mill Road, Suite 310 Fairfax, VA 22030

Mercury Group 1601 NW Expressway, Suite 1100 Oklahoma City, OK 73118

Image Direct Group LLC 200 Monroe Avenue, Building 4 Frederick, MD 21701

TMA Direct, Inc. 12021 Sunset Hills Road, Suite 350 Manassas, VA 20109

Membership Advisors Fund Raising 11250 Waples Mill Road, Suite 310 Fairfax, VA 22030

Krueger Associates, Inc. 105 Commerce Drive Aston, PA 19014 Infocision Management Corp. 325 Springside Drive Akron, OH 44333

Valtim Incorporated P.O. Box 114 Forest, VA 24551

Communications Corp of America Attn: Ken Bentley 13129 Airpark Drive, Suite 120 Elkwood, VA 22718

Salesforce.Com, Inc. One Mark St. – The Landmark, Suite 300 San Francisco, CA 94105

Speedway Motorsports, Inc. P.O. Box 600 Concord, NC 28026

Google 1600 Amphitheatre Parkway Mountain View, CA 94043-1351

United Parcel Services P.O. Box 7247-0244 Philadelphia, PA 19170

Stone River Gear, LLC P.O. Box 67 Bethel, CT 06801

CDW Computer Centers, Inc. P.O. Box 75723 Chicago, IL 60675

Government Agencies

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346 Office of Attorney General (NY) Attn: Letitia James 28 Liberty Street New York, NY 10005 Office of Attorney General (DC) Attn: Karl A. Racine 441 Fourth St., N.W., Suite 600-South Washington, DC 20001

Mahmooth A. Faheem
Lori A. Butler
Pension Benefit Guaranty Corporation
1200 K NW
Washington, DC 20005-4026
mahmooth.faheem@pbgc.gov
butler.lori@pbgc.gov
efile@pbgc.gov

Office of Attorney General (TX) Attn: Ken Paxton P.O. Box 12548 Austin, TX 78711-2548

Notice of Appearance

Laurie A. Spindler Linebarger Coggan Blair & Sampson, LLP 2777 N. Stemmons Freeway, Suite 1000 Dallas, TX 75207 dallas.bankruptcy@publicans.com

Brian E. Mason
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
mason.brian@dorsey.com

Natalie L. Arbaugh Winston & Strawn LLP 2121 N. Pearl Street, Suite 900 Dallas, TX 75201 narbaugh@winston.com

David Neier Winston & Strawn LLP 200 Park Avenue New York, NY 10166-4193 dneier@winston.com G. Michael Gruber Dorsey & Whitney LLP 300 Crescent Court, Suite 400 Dallas, TX 75201 gruber.mike@dorsey.com

H. Joseph Acosta Dorsey & Whitney LLP 300 Crescent Court, Suite 400 Dallas, TX 75201 acosta.joseph@dorsey.com

Thomas M. Buchanan Matthew Saxon Winston & Strawn LLP 1901 L St., N.W. Washington, DC 20036 tbuchana@winston.com msaxon@winston.com

Tara LeDay McCreary, Veselka, Bragg & Allen, P.C. P.O. Box 1269 Round Rock, TX 78680 tleday@mvbalaw.com Michael I. Baird Pension Benefit Guaranty Corporation 1200 K St. NW Washington, DC 20005-4026 <u>baird.michael@pbgc.gov</u> efile@pbgc.gov

Mark Ralston
Fishman Jackson Ronquillo PLLC
Three Galleria Tower
13155 Noel Road, Suite 700
Dallas, TX 75240
mralston@fjrpllc.com

Robert Lapowsky Stevens & Lee, P.C. 620 Freedom Business Center, Suite 200 King of Prussia, PA 19406 rl@stevenslee.com

Joe E. Marshall Marshall Law 2626 Cole Avenue, Suite 300 Dallas, TX 75204 jmarshall@marshalllaw.net

M. Jermaine Watson
Joshua N. Eppich
H. Brandon Jones
Clay M. Taylor
J. Robertson Clarke
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, TX 76102
jermaine.watson@bondsellis.com
joshua@bondsellis.com
clay.taylor@bondsellis.com
brandon@bondsellis.com
robbie.clarke@bondsellis.com

Brandon R. Freud Chuhak & Tecson, P.C. 30 S. Wacker Drive, Suite 2600 Chicago, IL 60606 bfreud@chuhak.com

Kevin T. White Director – Legal Quad/Graphics, Inc. 601 Silveron Blvd., Suite 200 Flower Mound, TX 75028 ktwhite@quad.com

David W. Giattino Stevens & Lee, P.C. 919 Market Street, Suite 1300 Wilmington, DE 19801 dwg@stevenslee.com

Duane M. Geck
Donald H. Cram
Severson & Werson, P.C.
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
dmg@severson.com
dhc@severson.com